

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE

In re:

Brian J. Goodman Sr.

Debtor

Chapter 13

Case Number 25-10233-KB

Honorable Kimberly Bacher

OBJECTIONS TO CONFIRMATION

NOW COMES Creditor, U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee of LSRMF MH Master Participation Trust II (“U.S. Bank”), by and through its attorneys, Orlans Law Group PLLC, and hereby Objects to Confirmation of Debtor’s Amended Chapter 13 Plan [Docket No. 183] (the “Plan”). In support, U.S. Bank states as follows:

1. On or about November 13, 2003, Brian J. Goodman executed a Mortgage to Mortgage Electronic Registration Systems, Inc., which is recorded in the Merrimack County Registry of Deeds at Book 2645 Page 1635 (the “Mortgage”).
2. The Mortgage is a first mortgage on real property owned by the Debtor known and numbered as 56 East Side Terrace, Northfield, NH 03276.
3. U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee of LSRMF MH Master Participation Trust II is the current holder of the Mortgage.
4. The Mortgage is materially in default.
5. The Debtor’s Chapter 13 Plan fails to treat Creditor’s mortgage and pre-petition arrearage. Debtor only intends to make one required payment based on a court order, but does not establish ongoing payment or provide payment to cure pre-petition arrearages.
6. As of April 11, 2025, the pre-petition arrearage was \$53,137.33.
7. Creditor, U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee of LSRMF MH Master Participation Trust II must receive the regular monthly

- mortgage payment of \$1,171.56 plus at least \$885.62 a month pre-petition arrearage in order for the arrearage to be cured within a reasonable length of time.
8. That Debtor's Chapter 13 Plan appears underfunded and infeasible to pay the post-petition monthly mortgage payments and cure the pre-petition arrearage within a reasonable length of time.

WHEREFORE, U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee of LSRMF MH Master Participation Trust II by and through its attorneys prays that this Objection of Debtor's Amended Chapter 13 Plan [Docket No. 183] be sustained and Confirmation be denied.

Date: January 29, 2026

Respectfully Submitted,

/s/ Conner Lang

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